


**Declaration of Laddy Valentine**  
*Valentine et al. v. Collier et al. (TXSD 4:20-cv-1115)*

1. My name is Laddy Valentine. I am over the age of 18 and of sound mind. The following is based on my personal knowledge.
2. I am currently incarcerated in the TDCJ Pack Unit (TDCJ # 017820338). *del*
3. I am very concerned for my health and safety because of the COVID-19 virus at the Pack Unit.
4. I am 69 years old. My date of birth is September 2, 1950.
5. I have high blood pressure and hyperlipidemia, and I take medications to manage my heart problems.
6. I had to have back surgery due to an injury from my time in the military, and I have drop foot. Because of these problems, I need a walker to move by myself.
7. Since the pandemic began, my dorm has been "locked down" several times while an inmate was tested after having symptoms.
8. The prison is denying me and other inmates at the Pack Unit protections from COVID-19.
9. The prison does not allow me or other prisoners to use waterless hand sanitizer.
10. Because I use a walker, it is hard for me to get up to wash my hands multiple times a day, and it would be much easier for me to keep my hands clean if I had hand sanitizer. There are other inmates here who use walkers or wheelchairs who I believe would have similar difficulties.
11. The prison has not adjusted my housing area so that I can sleep at least 6 feet away from other people. There are <sup>2</sup>~~54~~ men in my dorm, and I think I am no more than 5 feet away from my neighbors on both sides whenever we are in our cubicles. *del*

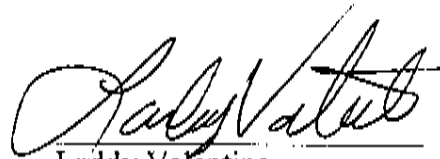
12. Though many of the officers started wearing face masks this week, there are other staff members who are still not wearing masks. ~~Some of the officers do not have proper masks, and are only wearing bandanas.~~ *for*
13. There has been no oral instruction for inmates about how washing hands can prevent spreading the virus. We were given handouts last week, but many prisoners are illiterate and cannot read them. I have not seen a video about how to prevent catching the virus, and there has not been an officer, nurse, or peer educator teaching us how to stay safe. ~~A true and correct copy of the handouts we were given is attached to this declaration as Exhibit 1.~~ *W*
14. The prison does not require me or other inmates to maintain a physical distance of 6 feet or more from others during group activities like meals, showers, recreation, and the "pill line" which forms outside the infirmary when inmates pick up their medications.
15. ~~I do not see inmate workers, like the food servers and laundry workers, wearing masks or gloves, even though they interact with many prisoners each day as part of their jobs. I do not believe ~~they~~ have access to hand sanitizer to use while doing their jobs, and have never seen them using hand sanitizer.~~ *INMATE WORKERS JW*
16. I filed a Step 1 grievance asking to get protection from COVID-19, but to the best of my knowledge the grievance has not yet been answered.
17. I see many elderly people every day at the Pack Unit.
18. I have seen long lines of prisoners waiting at the "pill window" to get medications, so I believe there are many chronically ill people at the Pack Unit.
19. I understand that I am a named Plaintiff in a class action lawsuit about the virus seeking to protect myself and other Pack Unit inmates.

20. I have spoken with my attorneys many times by telephone about the virus, and how the prison is responding to COVID-19.
21. I was ready to testify at the telephone hearing on April 2, 2020, if the judge wanted to hear from me.
22. I am familiar with Edwards Law, where some of my attorneys for this lawsuit work, because I also worked with these same attorneys as a potential witness and as a class member in a different class action lawsuit. I am confident in my attorneys' representation of me and other inmates for this issue.
23. My attorneys have explained the nature of the lawsuit to me by telephone.
24. It is my understanding the all visitors are barred from the Pack Unit, including my attorneys.
25. ~~I received the complaint in this lawsuit and read it.~~  I talked with my lawyers about the allegations in the complaint before they filed it.
26. I understand this is a lawsuit seeking a Court order to implement the protections I and other Pack Unit inmates need to minimize the spread of COVID-19.
27. I understand that the lawsuit is claiming violations of the Constitution and of laws protecting people with disabilities.
28. I understand that the lawsuit is supposed to help inmates at the Pack Unit to protect them from COVID-19.
29. I am ready and willing to continue working closely with my attorneys to help protect myself and other inmates at the Pack Unit from the virus.

30. I am ready and willing to cooperate in the ongoing litigation about the virus, including by testifying to the Court, participating in a deposition, assisting my lawyers in responses to written questions, or any other tasks my attorneys advise me I need to do.
31. I understand that my lawyers and I are asking for this to be a class action case on behalf of all Pack Unit prisoners, and we are asking for the Court to order that everyone be protected from the virus.
32. I am committed to serving as a class representative in this case, and will stay informed about the case, work with my attorneys to pursue the case, appear in court, and give testimony for the case as needed. I am willing to continue as a class representative to help others even if TDCJ takes steps to protect me personally without protecting other Pack Unit inmates.
33. I am not expecting to receive any money from serving as a class representative in this case. I am asking only that I, and everyone else at the Pack Unit, receive the protection they need from the virus. I am not asking for damages for myself or the class in this case.
34. All of the prisoners here need the same protections. I do not see how these protections would harm any prisoners, and the protections would be better if everyone at the prison was safe.
35. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

4-15-20

Executed on this Day



Laddy Valentine  
TDCJ # 01782033